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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TRACEY KOONCE, an individual,
Plaintiff,

vs.

MGM GRAND HOTEL, LLC, a Nevada
Limited Liability Company; DOES I-X,
inclusive; and ROE CORPORATIONS I-
X, inclusive,
Defendant.

Case No.: 2:22-cv-02061-CDS-DJA
(Lead Case)

PAUL TAYLOR, an individual,
Plaintiff,

vs.

MGM GRAND HOTEL, LLC, a Nevada
Limited Liability Company; DOES I-X,
inclusive; and ROE CORPORATIONS I-
X, inclusive,
Defendants.

Consolidated With:
Case No.: 2:22-cv-02069-CDS-DJA

DAVID PERSI, an individual,
Plaintiff,

vs.

MGM GRAND HOTEL, LLC, a Nevada
Limited Liability Company; DOES I-X,
inclusive; and ROE CORPORATIONS I-
X, inclusive,
Defendants.

Consolidated With:
Case No.: 2:22-cv-02087-CDS-DJA

1 INGA HAKAN, an individual,
2 Plaintiff,

Consolidated With:
Case No.: 2:22-cv-02097-CDS-DJA

3 vs.

4 MGM RESORTS INTERNATIONAL, a
5 Foreign Corporation; DOES I-X, inclusive;
6 and ROE CORPORATIONS I-X, inclusive,
7 Defendants.

8 **STIPULATION AND ORDER TO VACATE**
9 **SEPTEMBER 18, 2023 EARLY NEUTRAL EVALUATION**

10 Plaintiff PAUL TAYLOR, by and through his attorneys of record, ADAM R. FULTON,
11 ESQ. and LOGAN G. WILLSON, ESQ., of the law firm of JENNINGS & FULTON, LTD., and
12 Defendant MGM GRAND HOTEL, LLC, by and through its attorneys of record, PAUL T.
13 TRIMMER, ESQ. and LYNNE K. MCCHRYSTAL, ESQ., of the law firm of JACKSON LEWIS
14 P.C., stipulate to vacate the Early Neutral Evaluation (“ENE”) currently scheduled for September
15 18, 2023.

16 Since the rescheduling of the ENE, the parties have conducted three (3) prior ENE’s in the
17 related cases *Hakan v. MGM Resorts International*, *Persi v. MGM Grand Hotel, LLC*, and *Koonce*
18 *v. MGM Grand Hotel, LLC*, and all pending matters were consolidated by the Court. In the course
19 of participating in the ENE’s in the related cases, the parties have had extensive discussions
20 regarding the claims and defenses which are common to all cases. The parties have also recently
21 engaged in settlement discussions in *Taylor v. MGM Grand Hotel, LLC*. The parties were unable to
22 reach a settlement of Mr. Taylor’s claims and request the Court vacate the ENE in *Taylor v. MGM*
23 *Grand Hotel, LLC* because the parties have currently exhausted settlement efforts at this phase of

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the case and do not believe that further settlement negotiations will be effective so soon after the recent, unsuccessful attempts to reach an agreement.

DATED: August 14th, 2023

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JENNINGS & FULTON, LTD.

JACKSON LEWIS P.C.

/s/ Logan G. Willson, Esq.
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ORDER

IT IS SO ORDERED:



United States ~~District Court~~/Magistrate Judge

9-14-2023

Dated: _____

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